

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

(3) JEFFRI DAVILA-REYES
DEFENDANT,

Case No.: 15-721 (FAB)

MOTION REQUESTING ORDER FOR IMMEDIATE RELEASE AND DISMISSAL OF
CHARGES

TO THE HONORABLE COURT
HON. FRANCISCO A BESOSA
US DISTRICT COURT JUDGE

COMES NOW (3) JEFFRI DAVILA-REYES and through the undersigned
attorney, very respectfully State and Prays:

1. The first Circuit has vacated Mr. Davila's conviction and
ordered the district court to dismiss the Maritime Drug Law
Enforcement Act charges. (ECF# 136)

2. The indictment only charged violations, to the the Maritime
Drug Law Enforcement Act charges. (ECF# 10)

3. Mr. Dávila has been detained since November 09,2015.

4. Mr. Davila, Reg No. 05828-104, is detained at FCI Hazelton,
1640 Sky View Drive, Bruceton Mills, WV 26525.

WHEREFORE, it is respectfully requested that the Honorable
Court to acknowledge the present motion and order the immediate
release from the Federal Bureau of Prisons¹ of Mr. Davila and the
dismissal of all charges in the Indictment.

RESPECTFULLY SUBMITTED.

¹ Mr. Davila has a pending detainer from Immigration and Customs Enforcement, and he will be immediately place
in removal proceedings.

1 IN SAN JUAN, PUERTO RICO, JANUARY 21, 2022.

2 S/RAYMOND L. SANCHEZ MACEIRA

3 RAYMOND L. SANCHEZ MACEIRA

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8 CERTIFICATE OF SERVICE

9 I HEREBY CERTIFY: That on January 21, 2022, I electronically
10 filed the foregoing with the clerk of the court using CM/ECF system
11 which will send notification of such filing to the following: The
12 Assistant United States Attorney in charge of the case.

13 In SAN JUAN, P.R. January 21, 2022.

14 S/RAYMOND L. SANCHEZ MACEIRA

15 USDC NO. 211405

16 COUNSEL FOR DEFENDANT

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